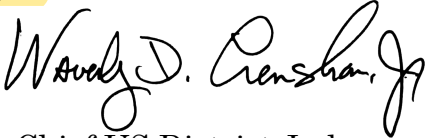


UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION


Chief US District Judge

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRIAN KELSEY,

Defendant.

No. 3:21-cr-00264-1

MOTION FOR LEAVE TO FILE EXCESS PAGES
IN SUPPORT OF BAIL MOTION REPLY

Comes now the Defendant Brian Kelsey, by and through counsel, and respectfully moves this Court for permission to file a reply in support of his motion for release pending appeal which exceeds the 5-page limit established by the Local Rules. In support of his motion, the Defendant states:

1. Under Local Rule 7.01(a)(4), “[a]n optional reply memorandum . . . shall not exceed five (5) pages without leave of Court.”
2. Defense counsel has completed and filed its Reply in support of Mr. Kelsey’s Motion for Release Pending Appeal. The Reply is 16 pages long.
3. This additional length is necessary to account for the number of new and lengthy arguments that the government raised in its Response (Doc. 169), including claims that the error was not properly preserved, and that Mr. Kelsey had forfeited his right for relief, which were not addressed in his original motion. Due to these